

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

6111 RIDGEWAY GROUP, LLC,	)	
	)	
Plaintiff,	)	
	)	No. 2:15-cv-02561-STA-cgc
v.	)	
	)	JURY DEMANDED
PHILADELPHIA INDEMNITY	)	
INSURANCE COMPANY also doing	)	
business as PHILADELPHIA	)	
INSURANCE COMPANIES, and	)	
CUNNINGHAM LINDSEY U.S., INC.,	)	
	)	
Defendants.	)	

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**DEFENDANT CUNNINGHAM LINDSEY U.S., INC.'S  
PARTIAL MOTION FOR JUDGMENT ON THE PLEADINGS**

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Defendant Cunningham Lindsey U.S., Inc. (“Cunningham Lindsey”), by and through its counsel and pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, respectfully moves the Court for an order dismissing Plaintiff’s claims for breach of contract, bad faith, constructive fraud and negligent misrepresentation, and violations of the Tennessee Consumer Protection Act, to the extent such claims are directed at Cunningham Lindsey. As grounds for its Motion, Cunningham Lindsey submits that, inasmuch as the foregoing claims are directed at Cunningham Lindsey, Plaintiff failed to state a claim upon which relief can be granted and Cunningham Lindsey is therefore entitled to judgment on the pleadings. In support of its Motion, Cunningham Lindsey relies on the memorandum of law filed contemporaneously herewith and the entire record in this cause.

Respectfully submitted,

s/ Mason W. Wilson  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 31, 2015, I filed the foregoing via the Court's electronic filing system, which sent notice to the following:

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